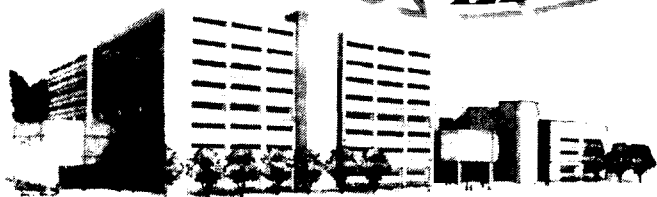


# COUNTY OF LAKE



Office of the Sheriff

RECEIVED

JUL 29 1994



FCC MAIL ROOM

Daniel A. Dunlap, Sheriff

July 25, 1994

The Honorable Reed E. Hundt, Chairman  
Federal Communications Commission  
1919 M Street, NW  
Washington, D.C. 20554

RE: CC Docket No. 92-77 Opposition to Billed Party Preference

Your Honor,

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps to prevent fraud, abusive calls and other criminal activity over the telephone network. Despite these safeguards, inmates have still found ways to circumvent such safeguards and abuse the inmate phone system through fraud and abusive calls to citizens whose rights they have violated through their criminal activity. BPP would not only eliminate such safeguards presently enjoyed by detention facilities but would also eliminate needed revenue to give inmates access to quality phone service. Costs incurred by detention facilities in housing inmates are growing by astronomical leaps and tax payers are being burdened by rising costs. Inmate phone revenue through inmate phone service providers is one of the few avenues available for tax payers to recover the cost of incarcerating individuals who have chosen to violate the constitutional rights of their fellow citizens.

We realize the burden of rates which inmate families pay for calls. Proper and effective action by the FCC would be to adopt rate ceilings on inmate calls and let the Sheriff's enforce these rate ceilings through contracts with phone companies.

In short, to protect the safety and security of the citizens of the United States, and to reduce the tax burden of law abiding citizens incurred from incarcerating those who choose to violate the laws of this country, we believe that Billed Part Preference must not be adopted.

Respectfully Yours,

Capt. Frank J. Leonbruno  
Corrections Administrator  
Lake County Adult Detention Facility  
Lake County, Ohio

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List ABCDE

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DO NOT FILE COPY ORIGINAL

W. II. KELLY  
WARDEN

## *Kent County Detention Center*

TELEPHONE  
(410) 778-6025

UNIT A  
104 VICKERS DRIVE  
CHESTERTOWN, MARYLAND 21620

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JUL 29 1994

July 25, 1994

FCC MAIL ROOM

The Honorable Reed E. Hundt, Chairman  
Federal Communications Commission  
1919 M Street, NW  
Washington, D.C. 20554

RE: CC Docket No. 92-77  
Opposition to Billed Party  
Preference

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmates calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the moral of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

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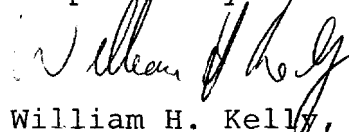
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July 25, 1994

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions -- decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,



William H. Kelly, Warden

Kent County Detention Center  
Unit A, 104 Vickers Drive  
Chestertown, Maryland 21620

DOCKET

July 20, 1994

The Honorable Reed Hundt, Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D. C. 20554

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JUL 29 1994

FCC MAIL ROOM

Re: CC Docket #92-77

Dear Chairman Hundt:

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. *For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.*

Over the past ten years, administrators of correctional facilities have been able to put into place a very effective system for allowing inmate phone calls. The right to choose our phone service provider has been key to our success. This service has always been delivered to us at very reasonable rates. What's more, inmate phone commissions have been a significant source of revenue for our facility and have helped us improve it dramatically. *We use this revenue to fund various programs including: law enforcement education; inmate health, education and recreation; jail personnel safety; drug prevention and other community programs; family visitation etc.*

*Here are a few of my biggest concerns about Billed Party Preference:*

- It strips correctional facility administrators of the right to choose inmate phone providers.
- Technology for BPP would reportedly cost upwards of \$1.5 billion, an expense that would have to be passed along to the consumer.
- Without the authority to process calls, inmate phone providers would no longer have the revenue to provide the sophisticated phone systems used in prisons. The end result: fewer phones with fewer security features. Facilities would have to revert to the old ways of supervising each and every inmate call.
- The average length of stay in jail would increase because inmates would not have the phone privileges required to make arrangements for obtaining bond. *This costs everyone!*
- Under BPP, correctional facilities would no longer have control over inmate calls, which means no call tracking or blocking. Inmates could conceivably harass judges, witnesses, jury members or even the victims of their crimes.
- Without call control, facilities would be unable to control fraud problems currently handled by inmate phone providers.

For the above reasons, and countless others, we believe that THE COSTS OF BILLED PARTY PREFERENCE FOR INMATE CALLS FAR OUTWEIGH THE BENEFITS. If BPP does become regulation, we urge you to make inmate calls exempt. Thank you for your consideration of my views.

Sincerely,

Deputy William Sauer -

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0

**Cheryl Ornelas**

**15811 Wilderness Pkwy  
San Antonio, TX 78232**

July 20, 1994

DATE: 7/29/94

The Honorable Reed Hundt  
Federal Communications Commission  
1919 M Street NW  
Washington DC 20554

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JUL 29 1994

FCC MAIL ROOM

Dear Representative Hundt:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for O+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,



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**Office of the Sheriff  
Wayne County**

RICHARD J. PISCIOTTI, Sheriff

August 1, 1994

The Honorable Reed E. Hundt, Chairman  
Federal Communications Commission  
1919 M Street, NW  
Washington, D.C. 20554

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

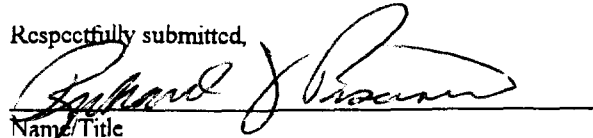
We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions -- decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,

  
Name/Title

WAYNE COUNTY JAIL

Name of Correctional Facility

7368 ROUTE 31, LYONS, NY 14489

Address

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JUL 29 1994

FCC MAIL ROOM

ORIGINAL

RECORDS DIVISION (315)946-5790  
FAX (315)946-5811

MAIN OFFICE - (315)946-9711  
CIVIL DIVISION - (315)946-5793

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August 1, 1994

The Honorable Reed E. Hundt, Chairman  
Federal Communications Commission  
1919 M Street, NW  
Washington, D.C. 20554

RECEIVED

JUL 29 1994

FCC MAIL ROOM

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt:

DOCKETED FOR ORIGINAL

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

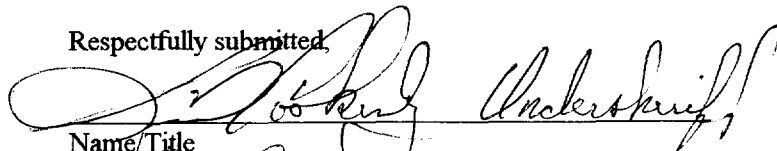
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Respectfully submitted,



Name/Title

Bay County Detention Center

Name of Correctional Facility

110 S Maple New Kirk Okla

Address

7-26-94

74647

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# KAY COUNTY SHERIFF

STATE OF OKLAHOMA

110 South Maple — Newkirk, Oklahoma 74647

Phone (405) 362-2517

Fax (405) 362-3684

Marion VanHoesen  
Sheriff

Sid Cookerly  
Undersheriff

July 26, 1994

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JUL 29 1994

FCC MAIL ROOM

Vice President Al Gore  
Office of the Vice President  
Old Executive Building  
Washington, D. C. 20501


Ref: Federal Communications Commission  
In the Matter of Billed Party Preference for  
O+interLATA Calls, CC Docket 92-77

## COMMENTS OF THE KAY COUNTY, OKLAHOMA DETENTION FACILITY

The Kay County, Oklahoma Sheriff's Department and Detention Center hereby go on record as opposed to billed party preference telephone tolls.

Should this program go into effect, it will destroy our inmate phone system and result in removal of all phones in cell blocks now operating 16 hours a day. We have neither the manpower nor equipment to service volume calling by B.P.P. and will simply remove said phones.

The Bill Clinton Administration has said many times it is a pro law enforcement administration; therefore, we request assistance in defeating this proposal in the Federal Communication Commission.

  
MARION VANHOESEN, SHERIFF  
BY SID COOKERLY, UNDERSHERIFF

CC: U.S. Senator Don Nickles  
U.S. Senator David Boren  
U.S. Representative Ernest Istook  
Reed E. Hundt, FCC  
James H. Quello, FCC

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CC: Andrew C. Barrett, FCC  
Rachelle B. Chong, FCC  
Susan Ness, FCC

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July 20, 1994

The Honorable Reed Hundt, Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D. C. 20554

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JUL 29 1994

FCC MAIL ROOM

Re: CC Docket #92-77

Dear Chairman Hundt:

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. *For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.*

Over the past ten years, administrators of correctional facilities have been able to put into place a very effective system for allowing inmate phone calls. The right to choose our phone service provider has been key to our success. This service has always been delivered to us at very reasonable rates. What's more, inmate phone commissions have been a significant source of revenue for our facility and have helped us improve it dramatically. *We use this revenue to fund various programs including: law enforcement education; inmate health, education and recreation; jail personnel safety; drug prevention and other community programs; family visitation etc.*

***Here are a few of my biggest concerns about Billed Party Preference:***

- It strips correctional facility administrators of the right to choose inmate phone providers.
- Technology for BPP would reportedly cost upwards of \$1.5 billion, an expense that would have to be passed along to the consumer.
- Without the authority to process calls, inmate phone providers would no longer have the revenue to provide the sophisticated phone systems used in prisons. The end result: fewer phones with fewer security features. Facilities would have to revert to the old ways of supervising each and every inmate call.
- The average length of stay in jail would increase because inmates would not have the phone privileges required to make arrangements for obtaining bond. *This costs everyone!*
- Under BPP, correctional facilities would no longer have control over inmate calls, which means no call tracking or blocking. Inmates could conceivably harass judges, witnesses, jury members or even the victims of their crimes.
- Without call control, facilities would be unable to control fraud problems currently handled by inmate phone providers.

For the above reasons, and countless others, we believe that THE COSTS OF BILLED PARTY PREFERENCE FOR INMATE CALLS FAR OUTWEIGH THE BENEFITS. If BPP does become regulation, we urge you to make inmate calls exempt. Thank you for your consideration of my views.

Sincerely,

*Jim Antosh*  
*Arch Sheriff, Leavenworth CO, OK.*

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Sheriff

MEMBER  
FLORIDA SHERIFF'S ASSOCIATION  
NATIONAL SHERIFF'S ASSOCIATION



DOCKET FILE COPY ORIGINAL  
C. W. "Charlie" Croft

OSCEOLA COUNTY  
400 SIMPSON ROAD  
KISSIMMEE, FLORIDA 34744-4455

TELEPHONE

(407) 348-2222

July 25, 1994

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JUL 29 1994

FCC MAIL ROOM

The Honorable Reed E. Hundt, Chairman  
Federal Communications Commission  
1919 M. Street, N.W.  
Washington, D.C. 20554

Re: CC Docket NO 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BBP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmates calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BBP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

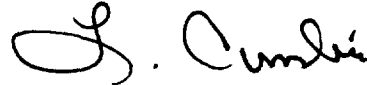
We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BBP would also eliminate the revenue stream that finances our inmate phones. If BBP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. We are currently overcrowded and the resulting increase in tension will make it more difficult for our staff to manage inmates.

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Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution of this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions--decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read "L. Cumbie", is written above the typed name.

Captain Linda Cumbie  
Osceola County Correctional Facility  
400 Simpson Road  
Kissimmee, FL. 34744

cc: The Honorable James H. Quello  
The Honorable Rachelle B. Chong  
The Honorable Andrew C. Barrett  
The Honorable Susan Ness

CALCASIEU  
CORRECTIONAL  
CENTER

PHONE 491-3800



Sheriff  
Wayne F. McElveen  
SHERIFF AND EX-OFFICIO TAX COLLECTOR

JOEY ALCEDE  
Warden

5410 EAST BROAD STREET  
LAKE CHARLES, LA 70615

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JUL 29 1994

FCC MAIL ROOM

July 26, 1994

The Honorable Reed E. Hundt, Chairman  
Federal Communications Commission  
1919 M Street, NW  
Washington, D. C. 20554

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt,

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We know the security needs at our facility and feel that it is imperative to route inmate calls from our facility to a single carrier that is equipped to properly handle inmate calls and with whom we have a contractual relationship. BPP will take away our ability to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls may be routed to a number of different carriers, none of whom will have any obligation to us, and therefore not be required to provide tracking reports on these calls.

We have installed phone equipment specifically designed for inmate calls. This equipment is designed to help prevent fraud, abusive calls, and other criminal activity over the telephone network. We have a contract with a local, reputable firm that is obligated to work with us as we strive to maintain the security of this institution. The courts have always held that security of an institution is paramount, and have given much latitude to jail administrators to ensure that remains the case.

The Public Service Commission guarantees that our service provider may not take advantage of inmate families by charging abusive rates. We are not in the business of generating money from inmate phone calls. If this were the case, we would constantly "shop" providers to obtain the best rates for us. We have the same provider we opened this facility with in 1990. There are other providers that can give us more revenue, but we are more concerned with security and accountability. The BPP system will not give us that ability.

We urge you to not adopt regulations that interfere with our security and administrative needs; needs that the courts have left to our discretion and which we have a public responsibility to make.

Respectfully submitted,

Joey Alcede  
Warden

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July 20, 1994

The Honorable Reed Hundt, Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D. C. 20554

Re: CC Docket #92-77

Dear Chairman Hundt:

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. *For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.*

Over the past ten years, administrators of correctional facilities have been able to put into place a very effective system for allowing inmate phone calls. The right to choose our phone service provider has been key to our success. This service has always been delivered to us at very reasonable rates. What's more, inmate phone commissions have been a significant source of revenue for our facility and have helped us improve it dramatically. *We use this revenue to fund various programs including: law enforcement education; inmate health, education and recreation; jail personnel safety; drug prevention and other community programs; family visitation etc.*

***Here are a few of my biggest concerns about Billed Party Preference:***

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For the above reasons, and countless others, we believe that THE COSTS OF BILLED PARTY PREFERENCE FOR INMATE CALLS FAR OUTWEIGH THE BENEFITS. If BPP does become regulation, we urge you to make inmate calls exempt. Thank you for your consideration of my views.

Sincerely,

*Richard Larson*  
Chief Deputy Sheriff  
Buffalo County  
Kearney, Nebraska

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JUL 29 1994

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July 20, 1994

The Honorable Reed Hundt, Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D. C. 20554

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Sincerely,

  
Floyd H. Stahr  
Deuel County Sheriff

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James L. Verwers, Sheriff  
515-792-5912  
515-792-4202 Fax

## Sheriff of Jasper County

Jasper County Courthouse Annex  
115 North 2nd Avenue East  
Newton, Iowa 50208



July 25, 1994

The Honorable Reed Hundt, Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

RE: CC Docket #92-77

Dear Chairman Hundt:

I am writing to voice my concerns about the Proposed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.

Over the past ten years, administrators of correctional facilities have been able to put into place a very effective system for allowing inmate phone calls. The right to choose our phone service provider has been key to our success. This service has always been delivered to us at very reasonable rates. What's more, inmate phone commissions have been a significant source of revenue for our facility and have helped us improve it dramatically. We use this revenue to fund various programs: inmate health; education and recreation; drug prevention and other community programs; family visitation, etc.

**These are some of my concerns about Billed Party Preference:**

It strips correctional facility administrators of the right to choose inmate phone providers.

Technology for BPP would reportedly cost upwards of \$1.5 billion, an expense that would have to be passed on to the consumer.

Without the authority to process calls, inmate phone providers would no longer have the revenue to provide the sophisticated phone systems used in prisons. The end result: fewer phones with fewer security features. Facilities would have to revert to the old ways of supervising each and every inmate call.

The average length of stay would increase because inmates would not have the phone privileges required to make arrangements for obtaining bond. This costs everyone.

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JUL 29 1994

FCC MAIL ROOM

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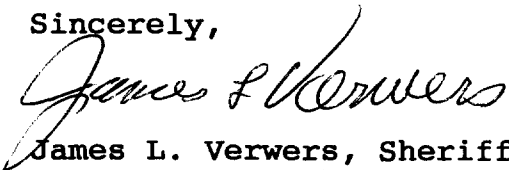
page 2

Under BPP, correctional facilities would no longer have control over inmate calls, which means no call tracking or blocking. Inmates could conceivably harass judges, witnesses, jury members or even the victims of their crimes.

Without call control, facilities would be unable to control fraud problems currently handled by inmate providers.

For the above reasons, and countless others, we believe that THE COST OF BILLED PARTY PREFERENCE FOR INMATE CALLS FAR OUTWEIGH THE BENEFITS. If BPP does become regulation, we urge you to make inmate calls exempt. Thank you for your consideration of my views.

Sincerely,

A handwritten signature in cursive script, reading "James L. Verwers".

James L. Verwers, Sheriff  
Jasper County Sheriff's Office  
P.O. Box 517  
Newton, Iowa 50208

mb

August 1, 1994

The Honorable Reed E. Hundt, Chairman  
Federal Communications Commission  
1919 M Street, NW  
Washington, D.C. 20554

RECEIVED

JUL 29 1994

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

FCC MAIL ROOM

Dear Chairman Hundt:

DOCKET FILE COPY ORIGINAL

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.


We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions -- decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,

  
Name/Title      Geno DeAngelo, Sheriff of Broome County

Broome County Sheriff's Office

Name of Correctional Facility

P.O. Box 2047  
Binghamton, N.Y. 13902

Address

CC: The Honorable James H. Quello  
The Honorable Rachelle B. Chong  
The Honorable Andrew C. Barrett  
The Honorable Susan Ness

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DEKALB COUNTY COURTHOUSE  
DECATUR, GEORGIA 30030  
TELEPHONE A/C 404-371-2391

PAT JARVIS, Sheriff

RECEIVED

JUL 29 1994

FCC MAIL ROOM

July 25, 1994

DOCKET FILE COPY ORIGINAL

The Honorable Reed E. Hundt, Chairman  
Federal Communications Commission  
1919 M Street, NW  
Washington, D.C. 20554

re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt,

We are vehemently opposed to the application of Billed Party Preference(BPP) at inmate facilities.

We have evaluated our administrative and security needs and have determined it necessary to route inmate calls to a single contract provider. We cannot extend to inmates the freedom to choose any carrier they please. This would take away our right to coordinate inmate calls through a carrier we trust.


We have long since determined the absolute necessity in utilizing telephone equipment specifically designed for inmate usage. Such equipment reduces the propensity for utilizing the telephone network for fraud, abusive calls, or other criminal activity. Given the budget constraints we face we would be unable to provide this equipment without the assistance of the inmate phone service provider. BPP would eliminate the revenue that funds our inmate phones. We strongly oppose any action that would place further costs upon the taxpayers of our county.

We are also sensitive to the rates inmate families pay for calls. We do however strongly believe that BPP is not the medium for regulating rate abuse. A more appropriate method would be to establish rate ceilings as Law or FCC Regulation which Sheriff's could enforce through their telephone service contracts. We are confident that the overwhelming majority of Sheriffs are resolute in requiring fair and reasonable rates.

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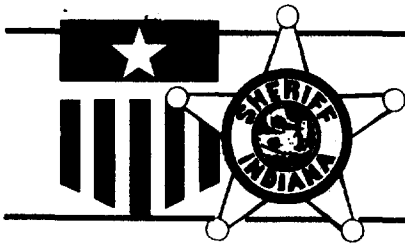
In conclusion, BPP would eliminate our ability to employ critical security and administrative measures necessary at our facility, ultimately reducing inmate phone availability, and in turn reducing staff efficiency. We implore you not to adopt any regulations which would impact upon our ability to appropriately address administrative and security issues.

For Sheriff Pat Jarvis,

A handwritten signature in black ink, reading "Robert W. Melton". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Major Robert W. Melton  
Commander, Dekalb County Jail  
Dekalb County, Georgia

CC: Honorable James H. Quello  
Honorable Rachelle B. Chong  
Honorable Andrew C. Barrett  
Honorable Susan Ness



*The Sheriff of Allen County*  
*Joseph M. Squadrito*  
 Room 102 Courthouse  
 Fort Wayne, Indiana 46802

July 25, 1994

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JUL 29 1994

FCC MAIL ROOM

The Honorable Reed E. Hundt, Chairman  
 Federal Communications Commission  
 1919 M. Street, NW  
 Washington, DC 20554

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt,

I strongly oppose the application of Billed Party Preference (BBP) at the Allen County Jail, or any inmate facility.

This jail has found it to be in the best interest of the citizenry to control inmate access to the communication system. Inmates cannot make harassing calls and on the rare occasion it may occur we have control of the system and can block calls when it is requested. To accomplish this we have installed phone equipment designed for use in a controlled environment. This security would be lost with the proposed BPP.

While I appreciate the FCC's concern for rates paid for calls by the family, or the called party, our sheriff has exercised great care in holding the cost down. I do not agree that the solution for bringing those less responsible individuals into line is to bring about a loss of control and revenue to all who are responsible. With the advent of BPP I fear a lessening of the ability to communicate and therefore a severe blow to inmate morale.

It appears that BPP would eliminate the revenue flow that our jail relies upon to buy communication equipment, and such a loss would bring about a deterioration of equipment. While most carriers want the business they do not want the responsibility for the equipment required to maintain close control and rugged enough for our use.

I feel the proposed regulation would take away a valuable security tool, decrease revenue, and make proper administration of inmate communications an impossibility. I urge you not to adopt this regulation!

Respectfully submitted,

*Henry E. Dill*

Henry E. Dill  
 Warden  
 Allen County Confinement Center  
 417 South Calhoun Street  
 Fort Wayne, IN 46802

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COUNTY OF OAKLAND  
**OFFICE OF THE SHERIFF**

JOHN F. NICHOLS

THOMAS QUISENBERRY  
*Major*



RECEIVED

HENRY BUFFA  
*Undersheriff*

JUL 29 1994

FCC MAIL ROOM

July 26, 1994

The Honorable Reed E. Hundt  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Chairman Hundt:

BILLED PARTY PREFERENCE - CC Docket NO. 92-77

As the Administrator of the second largest County Jail facility in the State of Michigan, I feel somewhat qualified to evaluate what call controls are necessary, both in the best interest of the inmate and the general public. I do not believe that this is the function of the Federal Government. Those of us in Corrections recognize that telephone call controls are necessary for a number of reasons.

Fraud perpetrated by telephone calls is increasing almost daily and is most difficult to investigate, but can be curtailed when one has the capability to control both the use of the phone and the carrier over which the calls are being made. Allowing inmate calls to go long distances through any number of carriers as opposed to a single service chosen and contractually committed to such calls leaves much to be desired and will create chaos and reduce the ability of the Corrections facilities to manage the security function. The harassment of witnesses, threats to complainants, and telephone fraud can run rampant when numbers of carriers must be identified, contacted, and dealt with.

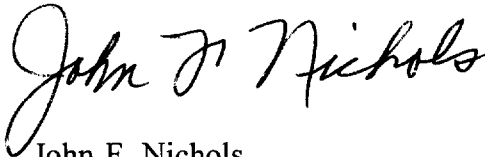
For us, it is an absolute mandate to have a provider who can service our facilities and inmates by providing number blocking, PINS, and screen out calls to persons inmates wish to threaten. This can, also, help to continue one of the primary sources of gang control inside the Jail. I vigorously oppose any legislation that would enable this situation to deteriorate to the point where the prisoners manipulate and control the system.

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It is difficult to understand how someone far removed from the problem and who has no responsibility can presume to set up standards which other people must live with and which are, certainly, not in the best interest of the general public. I, therefore, strongly urge that you recognize that the selection of the phone carrier for inmates services should be left with the installation Commanders and not with the Federal government.

Sincerely,

A handwritten signature in black ink that reads "John F. Nichols". The signature is written in a cursive, flowing style.

John F. Nichols  
Sheriff

JFN/ba

c: James H. Quello, FCC  
Andrew C. Barrett, FCC  
Rachelle B. Chong, FCC  
Susan Ness, FCC  
Al Gore, Vice-President  
Donald W. Riegle, Jr., U.S. Senator  
Carl Levin, U.S. Senator  
Bob Carr, U.S. Representative  
Dale E. Kildee, U.S. Representative  
Joe Knollenberg, U.S. Representative  
Sander Levin, U.S. Representative  
APCC Inmate Phone Services Providers Task Force  
Diane Brown, O.C. Facilities Maintenance and Operations

July 20, 1994

The Honorable Reed Hundt, Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D. C. 20554

RECEIVED  
JUL 29 1994  
FCC MAIL ROOM

Re: CC Docket #92-77

Dear Chairman Hundt:

I am writing to voice my concerns about the proposed Billed Party Preference regulation. The correctional facility inmate phone industry would be severely jeopardized by BPP, affecting inmates, their families and the criminal justice system as a whole. *For this reason, we are asking that inmate calls be exempt from the proposed BPP regulation.*

Over the past ten years, administrators of correctional facilities have been able to put into place a very effective system for allowing inmate phone calls. The right to choose our phone service provider has been key to our success. This service has always been delivered to us at very reasonable rates. What's more, inmate phone commissions have been a significant source of revenue for our facility and have helped us improve it dramatically. *We use this revenue to fund various programs including: law enforcement education; inmate health, education and recreation; jail personnel safety; drug prevention and other community programs; family visitation etc.*

***Here are a few of my biggest concerns about Billed Party Preference:***

- It strips correctional facility administrators of the right to choose inmate phone providers.
- Technology for BPP would reportedly cost upwards of \$1.5 billion, an expense that would have to be passed along to the consumer.
- Without the authority to process calls, inmate phone providers would no longer have the revenue to provide the sophisticated phone systems used in prisons. The end result: fewer phones with fewer security features. Facilities would have to revert to the old ways of supervising each and every inmate call.
- The average length of stay in jail would increase because inmates would not have the phone privileges required to make arrangements for obtaining bond. *This costs everyone!*
- Under BPP, correctional facilities would no longer have control over inmate calls, which means no call tracking or blocking. Inmates could conceivably harass judges, witnesses, jury members or even the victims of their crimes.
- Without call control, facilities would be unable to control fraud problems currently handled by inmate phone providers.

For the above reasons, and countless others, we believe that THE COSTS OF BILLED PARTY PREFERENCE FOR INMATE CALLS FAR OUTWEIGH THE BENEFITS. If BPP does become regulation, we urge you to make inmate calls exempt. Thank you for your consideration of my views.

Sincerely,

David L. Hope

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**DAYLE JAMES**  
Sheriff



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**WAYNE SPEARS**  
Undersheriff

**BARBARA GIFFORD**  
Office Manager

August 1, 1994

**RECEIVED**

**JUL 29 1994**

**FCC MAIL ROOM**

The Honorable Reed E. Hundt, Chairman  
Federal Communications Commission  
1919 M Street NW  
Washington, D.C. 20554

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt:

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Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective

**D.A.R.E.** TO KEEP KIDS  
OFF DRUGS

**OKMULGEE COUNTY COURTHOUSE**  
Okmulgee, Oklahoma 74447  
Office: 918/756-4311  
Fax: 918/758-1208

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